



**Lewis
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Middlemiss**
PLLC

MEMORANDUM ENDORSED

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May 1, 2023

VIA ECF

Hon. Gregory H. Woods
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St. , Room 2260
New York, NY 10007-1312

USDC SDNY
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**Re: In re: Application of Mihails Ulmans for Judicial Assistance Pursuant to
28 U.S.C. § 1782, No. 1:23-mc-00023-GHW-VF**

Dear Judge Woods,

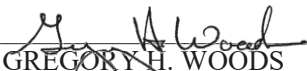
We represent Mr. Ulmans in the above-referenced *ex parte* application for judicial assistance. Our client is approaching a full year of unconsented, pre-trial incarceration in a Latvian prison, in connection with a murder for which he has steadfastly maintained his utter and actual innocence. There is no direct evidence and vanishingly thin circumstantial evidence of any involvement by our client in the murder for which he is imprisoned. Through our application, we seek urgently the Court's assistance as part of a process to identify alternative suspects to exonerate our client.

We filed our *ex parte* application here on January 26, 2023. On April 20, 2023, Magistrate Judge Figueredo issued a report recommending the Court grant our application (ECF No. 13). We appreciate the Court's heavy schedule and would not ordinarily seek the indulgence of an appearance at this juncture, but given the gravity of our client's situation, and that this proceeding represents perhaps his only opportunity to meaningfully challenge the charges against him, we respectfully request a hearing at the earliest opportunity to address our application and answer any questions the Court may have.

Application denied without prejudice. The Court would not benefit from a hearing at this time. The Court observes that, among other things, the deadline for objections to Judge Figueredo's report is in the future.

SO ORDERED.

Dated: May 2, 2023
New York, New York


GREGORY H. WOODS
United States District Judge

Respectfully,


Solomon B. Shinerock